

EXHIBIT A

Schedule A

REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE

**LETTER OF REQUEST FOR THE TAKING
OF EVIDENCE FROM MORRIS GOODMAN**

Testimony

1. The circumstances surrounding the creation and maintenance of each document produced.
2. For each document produced, testimony sufficient to establish whether or not such document is a “record of regularly conducted activity,” as that term is used in the United States Federal Rules of Evidence, Rule 803(6).
3. For each document produced, testimony sufficient to explain or identify the documents’ content, purpose, and author(s).

Production of Documents and Things

Pursuant to the applicable rules of Canada, Glaxo Group Limited hereby requests that the witness produce for inspection and copying each of the documents falling within the categories specified in the individually numbered requests below.

Unless otherwise agreed by all parties, the inspection and copying of documents shall take place within thirty (30) days after service, at the law offices of OGILVY RENAULT, 1981 McGill College Avenue, Suite 1100, Montreal, Quebec, Canada, H3A 3C1.

1. All documents and things related to the formulation, development, and testing of ranitidine oral solution by Novopharm Limited (“Novopharm”) (now a wholly owned subsidiary of Teva) or Pangeo Pharma (Canada), Inc., (“Pangeo”) (the purchaser of the Novopharm facility where the work was performed)(now known as PendoPharm, Inc., (“PendoPharm”), a division or subsidiary of Pharmascience, Inc., created by the merger of Pangeo and Pharmascience’s

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Consumer Products and Private Label Division), that preceded or lead to the formulation for which Teva is now seeking Food and Drug Administration (“FDA”) approval.

2. All documents and things relating or referring to each formulation of ranitidine oral solution considered, tested, used or proposed for use by Novopharm or Pangeo.

3. All documents and things relating or referring to each process or method for making ranitidine oral solution by Novopharm or Pangeo that has been considered, tested, used, proposed for use, or that preceded or lead to the formulation for which Teva is now seeking FDA approval.

4. All documents and things relating or referring to the research and development work concerning ranitidine oral solution that preceded or lead to the formulation for which Teva is now seeking FDA approval, whether performed in the United States or abroad, by or for Novopharm or Pangeo, including but not limited to all laboratory notebooks, memoranda, summaries, progress and research reports, meeting minutes, comparative studies, and the like.

5. All documents and things relating or referring to each actual or proposed change in the formulation, composition, or process of manufacture of ranitidine oral solution from the initial stages of development, including any development by Novopharm or Pangeo, to the present.

6. All documents and things relating or referring to any marketing study or plan prepared by or on behalf of Novopharm or Pangeo concerning the market for ranitidine oral solution, including but not limited to sales estimates or projections, pricing analyses, projected costs, projected market share, projected market growth, profit or incremental profitability

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analyses and related financial or market analyses, marketing reports, planning documents, profit and loss reports and market data provided by IMS Health, Inc.

7. All documents relating or referring to any communications between Pharmascience, including through its PendoPharm subsidiary or division, and Teva that concern any of the items in this Schedule A or the ranitidine oral solution litigation between Glaxo and Teva.